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BY ECF and Email

Honorable Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

Re: Gamero, et al. v. Koodo Sushi Corp., et al.,
15 Civ. 2697 (KPF)(SN)

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for plaintiffs in the above-referenced matter. I write jointly with Ms. Joanna Smith, who appears on behalf of defendant Michelle Koo solely for the limited purpose contained in Your Honor's Order for Limited Appearance of Pro Bono Counsel dated October 22, 2015 (the "October 22nd Order"). We write to inform the Court of the status of this matter.

Ms. Smith has met with Ms. Koo on multiple occasions, pursuant to the October 22nd Order, to review the case with her, advise her of the statutes implicated by the litigation and the options available to her. After meeting with Ms. Koo, Ms. Smith has conveyed to Plaintiffs' counsel that Ms. Koo is not interested in settlement at this time. At this time, Ms. Smith respectfully requests that her limited representation in the above-referenced matter be terminated as she has fulfilled the purposes outlined in the October 22nd Order.

Plaintiffs are appreciative of Ms. Smith's efforts, however, in light of the fact that we have not reached any form of settlement or alternative agreement, Plaintiffs must continue litigating this matter before the Court. The parties respectfully request a conference before the Court to schedule outstanding discovery and determine the next steps in this matter.

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The parties thank the Court for its attention to this matter.

Respectfully Submitted,

/s/

Raquel A. Gutiérrez
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff

cc:

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